

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LEINANI DESLANDES, on behalf of herself  
and all others similarly situated,

Plaintiff

v.

McDONALD'S USA, LLC, *et al.*

Defendants.

Civil Case No. 17-cv-04857

Judge Jorge L. Alonso  
Magistrate Judge M. David Weisman

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STEPHANIE TURNER, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

McDONALD'S USA, LLC, *et al.*

Defendants.

Civil Case No. 19-cv-05524

**JOINT STATUS REPORT**

Pursuant to the Court's December 17, 2024 Minute Order, Dkt. 519, Plaintiffs Leinani Deslandes and Stephanie Turner ("Plaintiffs") and Defendants McDonald's USA, LLC and McDonald's Corporation ("McDonald's") respectfully submit this Joint Status Report in advance of the February 26, 2025 status conference.

**I. Status of Discovery**

McDonald's has completed its document productions. Third-parties Cornerstone OnDemand, Inc. and the franchisees Anna Oquin, Leonardo Lopez, Jr., and Courtney Goodwin have also completed their document productions.

Plaintiffs took the deposition of Nicole Tracy, Human Resources Partner, Global Impact, on January 22, 2025 and the deposition of John Richardson, in-house counsel for McDonald's who verified McDonald's Supplemental Interrogatory Responses, on January 24, 2025. Plaintiffs also deposed Mr. Richardson in his capacity as a corporate representative designated for the 30(b)(6) deposition on January 24, 2025.

Both Plaintiffs and McDonald's issued deposition subpoenas to the three franchisees whose declarations McDonald's produced in this matter. The deposition of Anna Oquin was taken on February 4, 2025. The deposition of Courtney Goodwin was taken on February 14, 2025. The deposition of Leonardo Lopez, Jr. was taken on February 19, 2025.

There are no further depositions scheduled, and the parties do not anticipate a need for any additional fact discovery at this time.

**II. Discovery Schedule**

The parties' jointly-proposed schedule for the remaining case deadlines is below. These dates are the same as proposed in the parties' Joint Status Report dated December 16, 2024, Dkt. 518.

<b>Deadline</b>	<b>Previous Schedule</b>	<b>Parties' Proposal</b>
Deadline for Plaintiffs to file response to motion regarding ancillary restraint defense and cross-motion regarding ancillary restraint defense, if any; and deadline for Plaintiffs to file renewed motion for class certification	April 13, 2025	September 12, 2025
Deadline for Defendants to file reply in support of their motion regarding ancillary restraint defense and response to Plaintiffs' cross-motion regarding ancillary restraint defense, if any; and deadline for Defendants to file response to Plaintiffs' renewed motion for class certification	May 28, 2025	November 6, 2025
Deadline for Plaintiffs to file reply in support of renewed motion for class certification; and reply in support of cross-motion regarding ancillary restraint defense, if any	June 18, 2025	December 8, 2025

### **III. Disputes**

The parties have no disputes at this time. Because there are no current disputes or pending issues before the Court—besides the adoption of a further scheduling order—the parties are unopposed to the cancellation of the February 26, 2025 status conference should the Court deem it unnecessary.

Dated: February 23, 2025

/s/ Dean M. Harvey

Dean M. Harvey\*

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LLC and McDonald's Corporation*

**CERTIFICATE OF SERVICE**

I, Dean M. Harvey, an attorney, hereby certify that the parties' **Joint Status Report** was electronically filed on February 23, 2025 and will be served electronically via the Court's ECF Notice system upon the registered parties of record.

/s/ Dean M. Harvey